

**FILED**

JUL - 8 2025

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

TUYEN NGUYEN

Criminal No. *2:25-cr-185*  
(18 U.S.C. §§ 1349 and 1704)  
[UNDER SEAL]

**INDICTMENT****COUNT ONE**

The grand jury charges:

**THE CONSPIRACY AND ITS OBJECTS**

1. From in and around September 2022, and continuing thereafter to in and around August 2024, in the Western District of Pennsylvania and elsewhere, the defendant, TUYEN NGUYEN, and other individuals known and unknown to the grand jury, knowingly and willfully did conspire, combine, confederate, and agree with each other to commit Bank Fraud, in violation of 18 U.S.C. § 1344(1).

**MANNER AND MEANS OF THE CONSPIRACY**

2. , It was part of the conspiracy that its members, including the defendant, TUYEN NGUYEN, stole or otherwise fraudulently obtained valid personal, business, and United States Treasury checks. The conspirators obtained these checks by, among other methods, stealing them from blue collection boxes maintained by the United States Postal Service using unlawfully possessed Postal Service keys, recruiting United States Postal Service employees to steal them on behalf of the conspirators, and purchasing them from other members of the conspiracy who trafficked in stolen checks.

3. It was further part of the conspiracy that its members, including the defendant, TUYEN NGUYEN, devised methods by which fraudulent checks could be deposited in bank

accounts maintained by federally insured financial institutions. These methods included, among other things, recruiting other conspirators who would be willing to deposit fraudulent checks into their own bank accounts, or who would allow members of the conspiracy to do so.

4. It was further part of the conspiracy that its members, including the defendant, TUYEN NGUYEN, used the stolen and fraudulently obtained personal, business, and United States Treasury checks to create fraudulent checks, drawing on accounts at federally insured financial institutions. These fraudulent checks were designed to resemble the stolen and fraudulently obtained personal, business, and United States Treasury checks, but were altered so that they were made payable to one of the conspirators who had agreed to deposit fraudulent checks for, or make their bank account available to, the conspiracy.

5. It was further part of the conspiracy that its members, including the defendant, TUYEN NGUYEN, caused these fraudulent checks to be deposited into bank accounts maintained at federally insured financial institutions and belonging to those conspirators who had been recruited for the use of their accounts.

6. It was further part of the conspiracy that its members, including the defendant, TUYEN NGUYEN, caused funds to be depleted from the accounts into which the fraudulent checks had been deposited, before the federally insured financial institutions could discover that the checks were fraudulent. The funds were depleted by methods including ATM withdrawals, money orders, and electronic transfers accomplished via Cash App and similar applications. These funds were delivered to members of the conspiracy, including to the defendant, TUYEN NGUYEN, who shared them among themselves.

All in violation of Title 18, United States Code, Section 1349.

**COUNT TWO**


The grand jury further charges:


7. From on or about June 30, 2023, to on or about July 6, 2023, in the Western District of Pennsylvania, the defendant, TUYEN NGUYEN, knowingly possessed a key to an authorized receptacle for the deposit and delivery of mail matter with the intent unlawfully and improperly to use, sell, and otherwise dispose of the same, and to cause the same to be unlawfully and improperly used, sold, and otherwise disposed of.

All in violation of Title 18, United States Code, Section 1704.

A True Bill,

  
FOREPERSON

  
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